

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ELECTRONIC ENVIRONMENTS CORPORATION,)
Plaintiff)
)
v.)) **Civil Action No. 05-11093 NG**
)
JAMES M. EMMING,)
Defendant)
)

**INITIAL DISCLOSURE STATEMENT OF PLAINTIFF
ELECTRONIC ENVIRONMENTS CORPORATION
PURSUANT TO FED. R. CIV. P. 26 (a)(1)**

I. Individuals Likely to Have Discoverable Information

- a) Kenneth Rapoport, CEO
Electronic Environments Corporation
410 Forest Street
Marlborough, MA 01752
- b) Michael Kinglsey, President
Electronic Environments Corporation
410 Forest Street
Marlborough, MA 01752
- c) James Peltier
Electronics Environments Corporation
410 Forest Street
Marlborough, MA 01752
- d) Patricia Keville, Project Manager
Electronic Environments Corporation
410 Forest Street
Marlborough, MA 01752
- e) Eugene McNeil, Mid-Atlantic Regional Manager
Electronic Environments Corporation

410 Forest Street
Marlborough, MA 01752

- f) James Emming
114 Vauxhall Street
New London, CT 06320
- g) Peter Drumm, General Manager
JT Packard & Associates, Inc.
275 Investment Court
Verona, WI 53592

II. Relevant Documents

- a) Non-Competition and Confidentiality Agreement between Electronic Environments Corporation (EEC) and James Emming (Emming) dated June 7, 1999 in consideration for Emming s continued employment as an at-will employee at EEC;
- b) EEC Employee Handbook;
- c) Documents relating to Emming s employment with JT Packard & Associates (JT Packard), including but not limited to, offers of employment, contracts for employment, signing bonuses and incentive agreements and related communications between Emming and JT Packard;
- d) Mutual Confidentiality Agreement between EEC and JT Packard dated May 14, 2004.

III. Damages

Plaintiff seeks injunctive relief. Damages are not ascertainable at this time.

IV. Insurance

No known insurance applicable to Plaintiff s claim.

ELECTRONIC ENVIRONMENTS
CORPORATION
By its Attorney,

/s/ Leo S. McNamara

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